

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	CRIM. NO. 05-300 -MAP
)	
vs.)	VIOLATIONS:
)	
ELLIOTT BEALS,)	26 U.S.C. § 7203 - Failure
)	to File Income Tax Return
Defendant.)	(Counts One through Four)

The United States Attorney charges that:

INFORMATION

COUNT ONE: Title 26, United States Code, Section 7203 -
Failure to File 1998 U.S. Individual Income Tax
Return

On or about April 15, 1999, in the District of
Massachusetts,

ELLIOTT BEALS,

defendant herein, who was a resident of the District of
Massachusetts, had received gross income in the amount of at
least approximately \$141,678.00 during the calendar year 1998;
had a legal requirement by reason of said gross income to make an
income tax return to the Director, Internal Revenue Service
Center, at Andover, Massachusetts in the District of
Massachusetts, stating specifically the items of his gross income
and any deductions and credits to which he was entitled; and that
well-knowing and believing all of the foregoing, he did willfully

fail to make an income tax return to said Director of the Internal Revenue Service Center.

All in violation of Title 26, United States Code, Section 7203.

**COUNT TWO: Title 26, United States Code, Section 7203 -
Failure to File 1999 U.S. Individual Income Tax
Return**

On or about April 15, 2000, in the District of
Massachusetts,

ELLIOTT BEALS,

defendant herein, who was a resident of the District of
Massachusetts, had received gross income in the amount of at
least approximately \$382,699.02 during the calendar year 1999;
had a legal requirement by reason of said gross income to make an
income tax return to the Director, Internal Revenue Service
Center, at Andover, Massachusetts in the District of
Massachusetts, stating specifically the items of his gross income
and any deductions and credits to which he was entitled; and that
well-knowing and believing all of the foregoing, he did willfully
fail to make an income tax return to said Director of the
Internal Revenue Service Center.

All in violation of Title 26, United States Code, Section
7203.

**COUNT THREE: Title 26, United States Code, Section 7203 -
Failure to File 2000 U.S. Individual Income Tax
Return**

On or about April 15, 2001, in the District of
Massachusetts,

ELLIOTT BEALS,

defendant herein, who was a resident of the District of
Massachusetts, had received gross income in the amount of at
least approximately \$100,668.76 during the calendar year 2000;
had a legal requirement by reason of said gross income to make an
income tax return to the Director, Internal Revenue Service
Center, at Andover, Massachusetts in the District of
Massachusetts, stating specifically the items of his gross income
and any deductions and credits to which he was entitled; and that
well-knowing and believing all of the foregoing, he did willfully
fail to make an income tax return to said Director of the
Internal Revenue Service Center.

All in violation of Title 26, United States Code, Section
7203.

**COUNT FOUR: Title 26, United States Code, Section 7203 -
Failure to File 2001 U.S. Individual Income Tax
Return**

On or about April 15, 2002, in the District of
Massachusetts,


ELLIOTT BEALS,

defendant herein, who was a resident of the District of
Massachusetts, had received gross income in the amount of at
least approximately \$14,150.00 during the calendar year 2001; had
a legal requirement by reason of said gross income to make an
income tax return to the Director, Internal Revenue Service
Center, at Andover, Massachusetts in the District of
Massachusetts, stating specifically the items of his gross income
and any deductions and credits to which he was entitled; and that
well-knowing and believing all of the foregoing, he did willfully
fail to make an income tax return to said Director of the
Internal Revenue Service Center.

All in violation of Title 26, United States Code, Section
7203.

Filed this 3rd day of February, 2005.

MICHAEL J. SULLIVAN
United States Attorney



WILLIAM M. WELCH II
Assistant United States Attorney